

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

§

v.

§

TONYA BLACKWOOD (3)

§

§ CASE NUMBER: 4:15-CR-0151-O

§

**TONYA BLACKWOOD'S MOTION TO AMEND**  
**A CONDITION OF PRETRIAL RELEASE**

Defendant Tonya Blackwood has been indicted on charges of conspiracy to distribute methamphetamine of a quantity in excess of 50 grams. At the time of her arrest and subsequent release on pretrial release, she resided with Mr. Jackie Watters. Miss Blackwood is suffering from advanced cancer and Mr. Waters has been her caregiver for approximately 3 years. They hold themselves out as common-law spouses. Mr. Waters was recently arrested on a similar charge. He is charged by complaint under a different charging instrument in a different case number. However, Ms. Blackwood is named in Mr. Waters's complaint as a criminal coactor. A condition of Ms. Blackwood's pretrial release prohibits her from communicating with "codefendants." In light of the pre-existing relationship between Blackwood and Watters, Ms. Blackwood seeks an amendment of the conditions of her pretrial release to allow her to visit Mr. Waters, who is currently in custody, and to speak with him in person and by telephone and discuss personal matters unrelated to their prosecutions.

Respectfully submitted,

/s/ Robert Kersey  
Robert Kersey, SBN: 00784387  
922 W. Pearl St.  
Granbury, Texas 76048  
Tel: 817-579-6878

Fax: 817-579-6992  
E-mail: [rkersey@sbcglobal.net](mailto:rkersey@sbcglobal.net)  
Attorney for Defendant Blackwood

CERTIFICATES OF CONFERENCE

On August 25, 2015, attorney Kersey conferred with Assistant United States attorney Shawn Smith who reported that he opposes this motion.

/s/ Robert Kersey  
Robert Kersey

CERTIFICATE OF SERVICE

I certify that on August \_\_\_, 2015, I filed the foregoing Motion to Continue with the Clerk of Court via the court's electronic case filing system, which will send a notification of electronic filing to notify the below-named attorneys:

/s/ Robert Kersey  
Robert Kersey

Shawn Smith  
[Shawn.smith@usdoj.gov](mailto:Shawn.smith@usdoj.gov)